

John D. Hughes, Esq.
EDWARDS ANGELL PALMER & DODGE LLP
111 Huntington Avenue
Boston, MA 02199
(617) 239-0100
Attorney for Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ILLINOIS NATIONAL INSURANCE
COMPANY, THE INSURANCE COMPANY OF
THE STATE OF PENNSYLVANIA, and
NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA,

Plaintiffs,

v.

TUTOR PERINI CORPORATION,

Defendant.

C.A NO. 11-00431-PKC (ECF CASE)

MOTION TO ADMIT COUNSEL PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, John D. Hughes, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

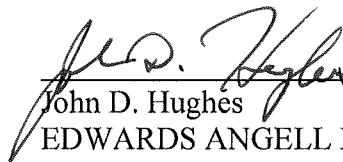
Richard J. McCarthy
Edwards Angell Palmer & Dodge LLP
111 Huntington Avenue
Boston, MA 02199
Ph.: (617) 239-0100
Fax: (617) 227-4420

Richard J. McCarthy is a member in good standing of the Bar of the Commonwealth of Massachusetts. He is admitted to practice in the Courts of the Commonwealth of Massachusetts,

the United States District Court for the District of Massachusetts, the United States District Court for the Northern District of California, the United States Court of Appeals for the First Circuit, the United States Court of Appeals for the Second Circuit and the United States Court of Appeals for the Third Circuit. He is in good standing in all Bars in which he is admitted (see attached hereto Exhibit A). There are no pending disciplinary proceedings against Richard J. McCarthy in any state or federal court.

Dated: July 28, 2011
Boston, Massachusetts

Respectfully submitted,

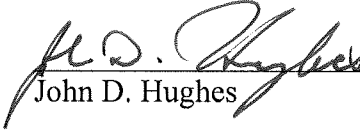


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jhughes@eapdlaw.com

Attorney for Plaintiffs Illinois National Insurance Company, The Insurance Company of the State of Pennsylvania and National Union Fire Insurance Company of Pittsburgh, PA

CERTIFICATE OF SERVICE

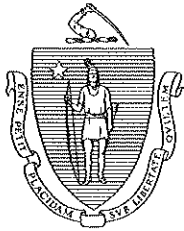
I, John D. Hughes, hereby certify that on this 28th day of July, 2011, I caused a true and correct copy of the foregoing Motion to Admit Counsel Pro Hac Vice, Certificate of Admission and Good Standing, Affidavit in Support of Motion and Proposed Order to be served by regular mail upon all counsel of record.


John D. Hughes

Finley T. Harckham, Esq.
Vianny Maria Pichardo, Esq.
ANDERSON KILL & OLICK, P.C.
1251 Avenue of the Americas
New York, NY 10020

Attorneys for Defendant Tutor Perini Corporation

EXHIBIT A



MAURA S. DOYLE
CLERK

The Commonwealth of Massachusetts
SUPREME JUDICIAL COURT

FOR SUFFOLK COUNTY
JOHN ADAMS COURTHOUSE
ONE PEMBERTON SQUARE, SUITE 1300
BOSTON, MASSACHUSETTS 02108-1707

WWW.SJCCOUNTYCLERK.COM

July 27, 2011

CASE INFORMATION (617) 557-1100

FACSIMILE (617) 557-1117

ATTORNEY SERVICES (617) 557-1050

FACSIMILE (617) 557-1055

Attorney Richard J. McCarthy
Edwards Angell et al
111 Huntington Ave.
Boston, MA 02199

IN RE: CERTIFICATE OF ADMISSION AND GOOD STANDING

Attorney Richard J. McCarthy:

Enclosed please find the Certificate of admission and good standing which you have recently requested from this office. This certificate attests to your date of admission and good standing at the Bar of the Commonwealth of Massachusetts.

If you have any questions or if this office can be of further assistance, please do not hesitate to contact Carla Tankle at 617-557-1177 or visit our web site at www.sjccountyclerk.com.

Very truly yours,

A handwritten signature in black ink, appearing to read "Maura S. Doyle", written in a cursive style.

MAURA S. DOYLE
Clerk
Supreme Judicial Court

MSD/ct
CL Received: July 27, 2011
enclosure

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

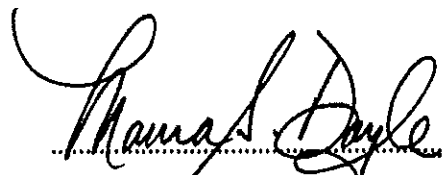
BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on the fifteenth day of December A.D. 1972, said Court being the highest Court of Record in said Commonwealth:

Richard J. McCarthy

being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court*.

In testimony whereof, I have hereunto set my hand and affixed the seal of said Court, this twenty-seventh day of July in the year of our Lord two thousand and eleven.




MAURA S. DOYLE, Clerk

* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.

John D. Hughes, Esq.
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Attorney for Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ILLINOIS NATIONAL INSURANCE
COMPANY, THE INSURANCE COMPANY OF
THE STATE OF PENNSYLVANIA, and
NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA,

Plaintiffs,

V.

TUTOR PERINI CORPORATION,

Defendant.

C.A NO. 11-00431-PKC (ECF CASE)

AFFIDAVIT OF JOHN D. HUGHES
IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE

COMMONWEALTH OF MASSACHUSETTS)
) SS:
SUFFOLK COUNTY)

John D. Hughes, being duly sworn, deposes and says:

1. I am a partner at Edwards Angell Palmer & Dodge LLP, counsel for Plaintiffs in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of

Plaintiffs' Motion to Admit Richard J. McCarthy as counsel pro hac vice to represent Plaintiffs in this matter.

2. I am a member in good standing of the Bar of the State of New York, and was admitted to practice law on November 24, 2003. In addition, I am admitted to practice in the Courts of the Commonwealth of Massachusetts, the United States District Court for the Southern District of New York, the United States District Court for the District of Massachusetts and the United States Court of Appeals for the First Circuit. I am in good standing in all Bars in which I am admitted.

3. I have known Richard J. McCarthy since 2002.

4. Mr. McCarthy is a partner at Edwards Angell Palmer & Dodge LLP, 111 Huntington Avenue, Boston, Massachusetts 02199.

5. I have found Mr. McCarthy to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

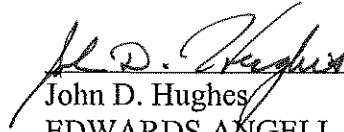
6. Accordingly, I am pleased to move the admission of Richard J. McCarthy, pro hac vice.

7. I respectfully submit a proposed order granting the admission of Richard J. McCarthy, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Richard J. McCarthy, pro hac vice, to represent Plaintiffs in the above captioned matter, be granted.

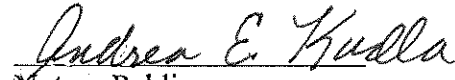
Dated: July 28, 2011
Boston, Massachusetts

Respectfully submitted,



John D. Hughes
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Fax.: (617) 227-4420
jhughes@eapdlaw.com
*Attorney for Plaintiffs Illinois National Insurance
Company, The Insurance Company of the State of
Pennsylvania and National Union Fire Insurance
Company of Pittsburgh, PA*

Sworn to before me this
28th day of July, 2011.


Notary Public
Andrea E. Kudla

My Commission Expires:
Notary Public of the Commonwealth of Massachusetts

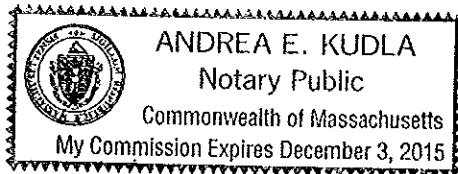


EXHIBIT A

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Attorney for Plaintiffs

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ILLINOIS NATIONAL INSURANCE
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Plaintiffs,

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Defendant.

C.A NO. 11-00431-PKC (ECF CASE)

ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION

Upon motion of John D. Hughes, attorney for Plaintiffs Illinois National Insurance Company, The Insurance Company of the State of Pennsylvania and National Union Fire Insurance Company of Pittsburgh, PA ("Plaintiffs") and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Richard J. McCarthy, Esq.
Edwards Angell Palmer & Dodge LLP
111 Huntington Avenue
Boston, MA 02199
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Fax: (617) 227-4420
rmccarthy@eapdlaw.com

is admitted to practice *pro hac vice* counsel for Plaintiffs in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: July ___, 2011
New York, New York

Hon. _____